
CHAPTER 9. ENFORCEMENT OF CIVIL RIGHTS-RELATED REQUIREMENTS;
NONDISCRIMINATION AGAINST INDIVIDUALS WITH
HANDICAPS IN EMPLOYMENT

SECTION 1. ENFORCEMENT OF CIVIL RIGHTS AND
NONDISCRIMINATION REQUIREMENTS

9-1. Covered Programs

- a. Owners of projects covered by the following programs are prohibited from discriminating in their tenant selection and assignment practices and in the provision of benefits and services based on race, color, religion, sex, handicap, familial status, national origin or age:
 - 1) Sections 207, 213, 221, 223, 231, and 236 of the National Housing Act.
 - 2) Section 101 of the Housing and Urban Development Act of 1965 (Rent Supplement).
 - 3) Section 8 of the United States Housing Act of 1937. See paragraph 1-2 of Handbook 4350.3 for a listing of project-based Section 8 programs covered by this Chapter.
 - 4) Section 202 of the Housing Act 1959, including projects funded by the 202 program as amended by the Housing and Community Development Amendments Act of 1987 and the National Affordable Housing Act of 1990.
 - 5) Section 811 of the National Affordable Housing Act of 1990 (Supportive Housing for Persons with Disabilities).
 - 6) Section 201 of the Housing and Community Development Amendments Act of 1978, as amended (Flexible Subsidy and Capital Improvements Loans).
- b. Owners of projects assisted under the following Federal programs must comply with Section 504 of the Rehabilitation Act of 1973 on nondiscrimination against individuals with handicaps:
 - 1) Section 221(d)(5) of the National Housing Act (221(d)(3) BMIR)

- 2) Section 236 of the National Housing Act (including units for which tenants receive Rental Assistance Payments);
- 3) Section 101 of the Housing and Urban Development Act (Rent Supplement);
- 4) Section 8 of the United States Housing Act of 1937. See paragraph 1-2 of Handbook 4350.3 for a listing of project-based Section 8 programs covered by this Chapter.
- 5) Section 202 of the Housing Act 1959, including projects funded by the 202 program as amended by the Housing and Community Development Amendments Act of 1987 and the National Affordable Housing Act of 1990.
- 6) Section 811 of the National Affordable Housing Act of 1990 (Supportive Housing for Persons with Disabilities)
- 7) Section 201 of the Housing and Community Development Amendments Act of 1978, as amended (Flexible Subsidy). See Appendix A of 24 CFR Section 8.

9-2. Overview.

- a. Owners must comply with the following civil rights and nondiscrimination requirements which are enforced by the Office of Fair Housing and Equal Opportunity (FHOO):
 - 1) Title VI of the Civil Rights Act of 1964;
 - 2) The Fair Housing Act;
 - 3) Executive Order 11063;
 - 4) Section 504 of the Rehabilitation Act of 1973, as amended;
 - 5) Age Discrimination Act of 1975 and
 - 6) Other applicable Civil Rights Authorities.

- b. The following contracts are executed by both HUD and the project owner to assure compliance with HUD's rules and regulations:
 - 1) The appropriate Regulatory Agreement for HUD-insured Multifamily rental housing, where applicable.
 - 2) The appropriate housing assistance contract, where applicable (e.g., the Rent Supplement contract; the Section 8 Housing Assistance Payments Contract, the Project Assistance Contract).
- c. Section 1 of this Chapter describes responsibilities of the Office of Housing Management in identifying possible signs of discrimination during a housing management review and provides for coordination between Housing and FHEO in resolving FHEO findings that also may be violations of Housing's program requirements. This section 1:
 - 1) Provides a checklist to be completed by Housing Management staff during a housing management review. This checklist helps Housing Management staff identify possible signs of discrimination. (See the checklist in Exhibit 9-1.) FHEO will use this checklist to decide whether FHEO follow-up is necessary.
 - 2) Describes procedures to provide coordination between Housing Management and FHEO. (See paragraph 9-3, Coordination Between Housing and FHEO.)
 - 3) Sets forth steps that are to be taken when an owner or manager refuses to resolve or correct FHEO findings that also may constitute violations of HUD program requirements. (See paragraphs 9-6 through 9-9 which cover actions Housing may take.)
- d. That Housing may impose sanctions on projects covered by this chapter in no way:
 - 1) limits the availability of the rights and remedies of complainants and respondents under the requirements enforced by FHEO or
 - 2) interferes with the prompt investigation of complaints by FHEO under its procedures.

9-3. Coordination Between Housing and FHEO.

- a. The Housing Management Division will provide the FHEO Program Operations Division (FHEO) with a list of projects scheduled for its Housing Management Reviews at least 30 days in advance of its planned management or occupancy review.
 - 1) This will allow FHEO to:
 - a) Plan its own review;
 - b) Participate in Housing's management review if resources permit; OR
 - c) Request that Housing management staff complete a FHEO Checklist on behalf of FHEO during the housing management review. (See paragraph 9-4, FHEO Checklist Completed by Housing Management Staff.)
 - 2) Under certain circumstances, the 30-day notice of an impending review may not be possible. This would occur, for example, when the Office of Housing receives information to indicate that an immediate review is necessary.
- b. FHEO will provide the Housing Management Division with a list of projects scheduled for FHEO monitoring and compliance reviews.

NOTE: Whenever possible, these activities should be coordinated at the beginning of the Fiscal Year.
- c. If FHEO advises the Housing Management Division that it is conducting, or is about to conduct, a compliance or monitoring review at a project at which a Housing Management or Occupancy review is scheduled, Housing's review may be postponed until the FHEO review is completed.
- d. If indications of irregularities or violations of FHEO requirements are apparent during a Housing Management Review, Housing Management will complete Exhibit 9-1 and provide it to FHEO. Housing Management should do this whether or not FHEO has requested Housing management to complete the FHEO checklist in Exhibit 9-1.

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- e. If necessary, and as appropriate, FHEO will request Housing Management's assistance in addressing civil rights issues by using Housing's program enforcement tools to correct program deficiencies. (See paragraphs 9-6 through 9-9).

9-4. FHEO Checklist (Exhibit 9-1) Completed by Housing Management Staff. This checklist provides information that FHEO staff can use in identifying possible patterns of housing and employment discrimination.

NOTE: Exhibit 9-1 is an addendum to the Management Review Questionnaire, Form 9834, and is not to be made part of it.

- a. Management staff may complete the FHEO Checklist when:
 - 1) Requested to do so by FHEO OR
 - 2) Housing Management finds FHEO-related irregularities or violations during a Housing Management Review.
- b. Housing Management staff may gather information in a variety of ways to complete Exhibit 9-1. Examples include:
 - 1) Reviewing files in the project owner's and/or manager's office;
 - 2) Routine questioning of management staff, including office staff, maintenance and engineering staff, and the resident manager regarding management practices;
 - 3) Questioning residents (e.g., knocking on doors or stopping residents in the project common areas) or
 - 4) Observing while walking through the project.
- c. It is FHEO's responsibility to analyze the collected data and determine if an FHEO review is recommended (e.g., monitoring review or compliance review).

9-5. Management Review Closeout that Involves FHEO Related Issues

- a. Upon completion of the closeout of the Housing Management Review, the Housing Management Division will

advise the project owner/manager that it completed the FHEO checklist and that the information will be referred to FHEO.

- b. The Housing Management Division will provide FHEO with a copy of the Management Review Questionnaire, Form HUD 9834 and Exhibit 9-1 of Handbook 4350.1 after Housing's closeout with the project owner. (FHEO will determine if there is sufficient evidence to warrant an FHEO monitoring visit or to recommend a compliance review to the Regional Office.)
- c. FHEO follow-up will not affect the closeout of Housing's Management Review.

9-6. Housing Management's Assistance in Correcting Civil Rights-Related Deficiencies through Voluntary Measures

- a. Once FHEO has made a finding of apparent noncompliance with fair housing and/or equal opportunity requirements and the finding or determination also constitutes a violation of Housing's program requirements, FHEO may seek Housing's assistance in achieving compliance through voluntary measures, such as:
 - 1) Housing and FHEO will meet with the project owner and/or manager to establish a plan and timetable for corrective action, to be monitored by FHEO.
 - a) If FHEO anticipates a satisfactory resolution of the problem(s), a reasonable extension may be granted by FHEO.
 - b) The owner and/or manager should not have unlimited extensions of time to develop and submit an acceptable corrective action plan.
 - 2) Housing will take into account any program deficiencies in connection with:
 - a) Its subsequent Management or Occupancy Reviews; and
 - b) Upcoming Previous Participation Board reviews.
- c. The owner or manager should be made aware of the fact that failure to reach a satisfactory solution could result in HUD taking remedial action(s) to correct program deficiencies. (See paragraphs 9-7, Housing's

Program Sanctions, 9-8, Sanctions Delegated to the Field Office Housing Management Division, and 9-9, Sanctions Reserved by the Office of Housing in Headquarters.)

- 9-7. Housing's Program Sanctions. If efforts to reach a satisfactory solution through voluntary means fail, FHEO may request Housing's assistance through the imposition of Housing's program sanctions to correct program deficiencies. (See paragraphs 9-8 and 9-9 for specific sanctions available to field offices and to Headquarters.)
- a. The regulatory agreement and/or subsidy contract for a specific project list(s) the various authorities permitting the Department to impose administrative sanctions on the owner.
 - 1) Regulatory agreements for insured multifamily housing projects and subsidy contracts providing housing assistance list sanctions that the Department can take in enforcing Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Executive Order 11063, the Age Discrimination Act of 1975 and other applicable civil rights authorities. Sanctions may also be provided in the HUD program regulations and handbooks.
 - 2) Because Section 504 of the Rehabilitation Act of 1973 applies only to programs receiving Federal financial assistance, it is the subsidy contracts that give the Department authority to impose sanctions on owners for failure to comply with Section 504.
 - b. Housing, in consultation with FHEO, will review the Housing program sanctions and determine the course of action to be taken. Housing will notify the owner and manager of FHEO's request and the remedies FHEO is seeking.
 - c. The project owner or manager should be given sufficient time to contact FHEO in an effort to resolve the outstanding issues. Failure on the part of the owner to do so will result in Housing taking appropriate remedial action.
 - d. Before imposing sanctions (e.g., suspending, terminating, or refusing to grant or continue Federal financial assistance or suspending or debarring an owner from participation in Federal programs), the Department must comply with the administrative procedures found in

the regulations and applicable regulatory agreement and/or subsidy contract (e.g., conducting administrative hearing).

- e. Decisions to impose sanctions must consider the following:
 - 1) It is the responsibility of the Office of Housing to protect the insurance fund, maintain housing for those it is intended to serve, administer the subsidy contracts, and assure compliance with HUD's rules and regulations.
 - 2) The Office of Housing will cooperate with other HUD officials in coordinating appropriate sanctions that will further the goals in paragraph e1) immediately above (e.g., doing everything reasonable to assure compliance with Title VI, the Fair Housing Act, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, Section 3 and other applicable civil rights authorities).
- f. If, after consultation with OGC and FHEO, Housing determines that the use of sanctions threatens project viability, where applicable, it may recommend that FHEO refer the matter to the Department of Justice to seek alternative remedies available in Federal court. (However, notwithstanding any provisions of this Chapter, complaints filed with HUD under the Fair Housing Act are subject to complaint processing procedures for that statute.) See paragraphs 9-2b, c and d, Overview.

9-8. Sanctions Delegated to the Field Office Housing Management Division.

- a. When an owner and/or manager refuses to take the necessary action to satisfactorily resolve an FHEO finding, and related program deficiencies exist, FHEO may request that Housing Management impose sanctions permitted by the regulatory agreement or subsidy contract. (See also Handbooks 4350.1, Chapter 8, and 4370.1, Chapter 2, for related discussions of enforcement actions.)
- b. Housing Management will take FHEO recommendations into consideration in determining which sanctions to impose. Housing Management staff should consult with Field Office counsel and FHEO before imposing any sanctions to

assure there is coordination between Housing Management and FHEO with respect to any actions that FHEO will take.

- c. Housing Management must assure that any sanctions imposed by the Office of Housing will not adversely affect or cause serious economic harm to the project (e.g., termination of subsidy payments to a project will adversely affect both the project and tenants receiving assistance).
- d. Withholding of HUD's approval may be used to obtain the owner's compliance with the program requirements.

Examples include withholding approval or withdrawal of approval (where applicable) for the following:

- 1) remodeling, adding to, or removal from mortgaged property.
- 2) amendments to subsidy contracts.
- 3) management firms.
- 4) flexible subsidy loans.
- 5) transfer of physical assets.
- 6) withdrawals from the Reserve for Replacements Account
- 7) modification of mortgage terms.
- 8) budgeted rent increase.
- 9) authorization to take distributions

9-9. Sanctions Authorized by Office of Housing in Headquarters.

- a. Normally the sanctions in paragraph 9-8 should be considered first. However, in certain situations the actions in paragraph 9-9 may be more effective for achieving compliance or more appropriate for assuring that the physical and financial condition of the property does not deteriorate to an unacceptable level.
 - b. The Office of Housing in Headquarters may authorize the use of the sanctions listed below to enforce the terms and conditions of the Regulatory Agreement or the subsidy contract. The Field Office should determine
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which of these sanctions best serves FHEO's objectives without seriously impairing the project's needs, and should seek Headquarters approval prior to imposition.

- 1) Seek judicial action to take possession of the project, and operate it in accordance with the terms of the Regulatory Agreement until the Secretary determines that the owners are again in a position to operate the project according to the Regulatory Agreement and in compliance with the requirements of the mortgage.
 - 2) Apply to any State or Federal court for specific performance of the Regulatory Agreement, an injunction against any violation of the Regulatory Agreement, appointment of a receiver to take over and operate the project according to the Regulatory Agreement, or for such other relief as may be appropriate.
 - 3) Cancel subsidy contract, if applicable.
 - 4) Accelerate the mortgage and initiate foreclosure of the mortgage.
- c. For sanctions imposed by the Office of Housing, that office will take FHEO's recommendations into consideration when making a decision on which sanction to use.

9-10. FHEO Actions. FHEO may at any time begin enforcement proceedings consistent with applicable statutes and regulations. Generally, FHEO will begin processing a complaint at the time it is clear that the Office of Housing and FHEO are unable to secure the owner's compliance with civil rights requirements by voluntary means or through Housing's actions under paragraph 9-8 and 9-9.

9-11. Field Office Reporting

- a. When a Field Office imposes Housing's program sanctions under paragraph 9-8, or recommends Headquarters' Housing sanctions under paragraph 9-9, it must provide a complete report of the findings, negotiations, and results of any initiatives taken toward achieving compliance. Send this report to: 1) Headquarters Office of Multifamily Housing Management (HMH) and 2) Headquarters Office of Enforcement and Compliance (EC).
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- b. If HUD forecloses the mortgage or terminates a subsidy contract, the Field Office will prepare the necessary documents and recommend debarment of the owner and/or manager.

SECTION 2. NONDISCRIMINATION AGAINST INDIVIDUALS WITH HANDICAPS IN EMPLOYMENT (Section 504 of the Rehabilitation Act of 1973)

9-12. Applicability. This Section 2 of Chapter 9:

- a. Applies to the programs listed in paragraph 9-1b of this Chapter.
- b. Applies to owners of assisted housing projects and their agents, regardless of how many employees the owner has or whether the project is fully or partially assisted. Hereafter, the term, "owners" will be used to refer to both owners and their agents.
- c. Applies to all project employees (i.e., employees paid from the project account).
- d. Applies to management agents in recruiting, hiring, providing fringe benefits, supervising and training project employees and applicants for employment.
- e. Does not generally apply to other entities or to the employees of entities that provide goods and services to the project through a contractual relationship, (e.g., systems maintenance, equipment maintenance, delivery of supplies and equipment, building maintenance and repair).

9-13. Requirements. Section 504 of the Rehabilitation Act of 1973 contains prohibitions against employment discrimination in assisted housing projects. (See 24 CFR Section 8.)

- a. No qualified individual with handicaps shall, solely on the basis of handicap, be subjected to discrimination in employment. (See definition in 24 CFR Section 8.3.)
 - b. Owners and their agents may not limit, segregate, or classify applicants or employees in any way that adversely affects their opportunities or status because of handicap.
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- c. Owners and their agents may not participate in a contractual or other relationship that has the effect of subjecting qualified applicants with handicaps or employees with handicaps to discrimination prohibited by 24 C.F.R. Section 8, Subpart B, Employment, as implemented by this Section 2 of Chapter 9 of Handbook 4350.1. Such relationships include relationships with:
 - 1) management agents
 - 2) employment and referral agencies
 - 3) labor unions
 - 4) organizations providing or administering fringe benefits to employees of the Owner and
 - 5) organizations providing training and apprenticeship programs.

9-14. Prohibitions Against Employment Discrimination apply to the following activities:

- a. Recruitment, advertising, and the processing of applications for project employment.
 - b. Hiring, upgrading, promotion, award of tenure, demotion transfer, layoff, termination, right of return from layoff, injury or illness, and rehiring.
 - c. Rates of pay or any other form of compensation and changes in compensation.
 - d. Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists.
 - e. Leaves of absence, sick leave, or any other leave.
 - f. Fringe benefits available by virtue of employment, whether or not administered by the Owner.
 - g. Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, and selection for leaves of absence for training.
 - h. Employer-sponsored activities, including social or recreational programs AND
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- i. Any other term, condition, or privilege of employment.

9-15. Reasonable Accommodation.

- a. Owners must make reasonable accommodation to the known physical or mental limitations of an otherwise qualified applicant with handicaps or employee with handicaps, unless the owner can demonstrate that the accommodation would impose an undue hardship on the operation of its program.
- b. Owners may not deny any employment opportunity to a qualified handicapped employee or applicant if the basis for the denial is the need to make reasonable accommodation to the physical or mental limitations of the employee or applicant.
- c. Owners should document reasons for refusing to accommodate an employee with handicaps based on undue hardship. This information may be needed if a complaint is filed by an employee under the enforcement provisions of Section 504 or HUD makes a finding of noncompliance as part of a review of an owner's compliance with Section 504 requirements. (See 24 C.F.R. Part 8, Subpart D, Enforcement.)
- d. In determining under paragraph a. above whether an accommodation would impose an undue hardship on the operation of an owner's project, owners may consider:
 - 1) The type of the owner's operation, including the composition and structure of the owner's workforce (e.g., Does a particular job require an employee to perform duties involving both large and small motor skills and visual and aural acuity?).
 - 2) The nature and cost of the accommodation needed.
 - 3) The overall size of the project with respect to number of employees, number and type of facilities and size of budget.
 - a) When a project is covered by more than one contract/agreement, it is considered one project as long as it is treated as a whole for processing and management purposes, whether or not the project is all located on one site.
 - b) In general, Federal financial assistance is extended by a contract to a corporate entity

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which owns only that project and only one entity is signatory to the HUD contract. In such cases, only the resources of the corporate entity which owns the project are considered in determining whether an accommodation requested would impose an undue hardship.

NOTE: In some unusual cases, it is possible that one contract covers more than one project receiving Federal financial assistance and/or more than one entity is signatory to the HUD contract. In such cases, all the resources of the owner of any of the projects covered by the contract as well as all the resources of any of the contracting entities would be considered in making a determination of undue hardship.

9-16. Employment Criteria

- a. Owners may not use any employment test or other selection criterion that screens out or tends to screen out individuals with handicaps or any class of individuals with handicaps unless:

- 1) The Owner can show that the test score or other selection criterion, as used by the owner, is job-related for the position in question;

EXAMPLES: The maintenance job requires moving and installing major appliances; the receptionist job requires the applicant to answer phones and communicate with the public who visit the office; the bookkeeping job involves posting and depositing rent checks;

AND

- 2) The HUD Field Office Manager or the Contract Administrator, where there is one, demonstrates that alternative job-related tests or criteria that tend to screen out fewer individuals with handicaps are unavailable.

- b. Owners must assure that any employment tests measure the job skills required for the job.

- 1) Owners must assure that when tests are given to individuals with handicaps that impair sensory, manual, or speaking skills, that test results accurately reflect the applicant's or employee's job skills, aptitude, or whatever other factor the test claims to measure, rather than the individual's impaired sensory, manual, or speaking skills.
- 2) Owners may use tests that screen for sensory, manual or speaking skills when those skills are the factors being tested for the job and those factors are required for the job.

9-17. Pre-employment Inquiries.

- a. Owners generally may not make a pre-employment inquiry or conduct a pre-employment medical examination of an applicant to determine whether the applicant is an individual with handicaps or to determine the nature or severity of a handicap.
- b. Owners may make pre-employment inquiries into the ability of all applicants to perform job-related functions.
- c. Owners may condition an offer of employment on the results of a medical examination conducted before the employee's entrance on duty if all entering employees in that category of job classification are given such an examination regardless of handicap, and the results of such examinations are used only in accordance with 24 CFR Section 8, Subpart B, Employment and with Section 2 of this Chapter. See also 42 U.S.C. 12112, Section 102 of the Americans with Disabilities Act of 1990.
- d. Information obtained by owners under Section 2 of this chapter concerning the medical condition or history of the applicant is to be collected and maintained on separate forms that are kept as confidential medical records, except that:
 - 1) Supervisors and managers may be informed of restrictions on the work or duties of individuals with handicaps and informed of necessary accommodations.
 - 2) First aid and safety personnel may be informed if the condition might require emergency treatment AND

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- 3) Government officials investigating compliance with Section 504 shall be provided relevant information upon request.
- e. When an owner is taking affirmative action efforts, the Owner may invite all applicants for employment to indicate whether and to what extent they are handicapped, if the following conditions are met:
 - 1) The owner states clearly on any written questionnaire used for this purpose, or makes clear orally, if no written questionnaire is used, that the information requested is intended for use solely in connection with its remedial action obligations, or its voluntary or affirmative action efforts AND
 - 2) The Owner states clearly that the information is being requested on a voluntary basis, that it will be kept confidential, that refusal to provide the information will not subject the applicant or employee to any adverse treatment, and that the information will be used only in accordance with 24 CFR Section 8 and Section 2 of this Chapter.

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FHEO CHECKLIST
(To be completed by Housing Management staff)

INSTRUCTIONS: When Housing Management receives a request from FHEO under paragraph 9-4 of this handbook 4350.1 for a particular project, they will complete this exhibit for that project when performing the housing management review. Housing Management will also complete this checklist whenever it finds apparent irregularities or violations of FHEO related requirements, even if FHEO has not made such a request. Housing Management will forward a copy of Exhibit 9-1 to FHEO for any necessary action.

This checklist alerts FHEO to certain owner practices that may indicate noncompliance with FHEO requirements. With this information FHEO

can decide whether to perform a full FHEO monitoring or compliance review. The questions in this exhibit cover topics that Housing Management staff can be expected to evaluate. It is not intended to cover the full range of FHEO concerns.

ANSWER YES OR NO TO EACH QUESTION ("Y" or "N"). IF YOU CAN'T ANSWER A QUESTION LEAVE IT BLANK. Use the space at the bottom of the last page or attach another sheet of paper to record additional information about any of the questions or to record any observations that you think should be passed along to FHEO.

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1. Is an Affirmative Fair Housing Marketing Plan required for this project? (If yes, answer questions and 3. If no, proceed to question 4.)
2. Does the owner/manager have a HUD approved Affirmative Fair Housing Marketing Plan?
3. Does it appear that the owner/manager follows this plan? Is this evident from observations, a review of the files, the Affirmative Fair Housing Marketing applicant report, or from routine questioning of management staff?
4. Does it appear through your observations that persons from all eligible racial/ethnic groups in the housing market are fairly represented in the project?
5. From routine interviews and a review of records, does it appear there are indications that the owner/manager takes applications, determines eligibility, or otherwise treats applicants differently on the basis of race, color, religion, sex, familial status, handicap, national origin or age?
6. If the project has both minority and non-minority tenants, does it appear that minority tenants of a particular racial or ethnic group are clustered in any portion of the project?
7. In the case of an owner/manager with more than one project, are there indications or is there evidence of steering or segregating of certain racial/ethnic groups in different projects?
8. How many firms which have contracts/agreements to provide services related to management and ongoing operation of the project are Section 3 business concerns? (Section 3 business concerns are businesses located in or substantially owned by the residents of the same metropolitan area or non-metropolitan county as the assisted project).

EXHIBIT 1

NOTE: Section 3 requirements apply to assisted housing projects, including projects listed in paragraph 9-1b and other projects that receive loans, grants, subsidies or other financial assistance under a HUD program (e.g., aid in urban planning, development or redevelopment).

9. Does the owner keep written records to show compliance with Section 504 (assisted housing projects only) and the Fair Housing Act?
10. Does the owner publish or post a Notice for participants, employees, unions, and professional and advocacy organizations? If so, does the Notice contain the following information?
 - a) The owner does not discriminate on the basis of handicap in admission or access to the project?
 - b) Where to find information concerning the existence and location of accessible services, activities and facilities?
 - c) The name, address, and telephone number of the person (or position) designated to coordinate the owner's efforts to comply with Section 504?

NOTE: Paragraph c applies to assisted housing projects employing 15 or more persons. (See 24 CFR Section 8.53, of the Section 504 regulations.)

11. Do recruitment materials and other informational materials published by the owner contain a pledge not to discriminate on the basis of handicap?